



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

July 12, 2016

Ms. Leslie Patterson  
Remedial Project Manager  
U.S. EPA, Region 5  
Superfund Remedial Response,  
SR-6J  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Re: South Dayton Dump & LF, Moraine  
Remediation Response  
Correspondence  
Remedial Response  
Montgomery County  
557000752003

**Subject: Ohio EPA Response to April 14, 2016 Scoping Meeting, South Dayton Dump and Landfill CERCLA Site, Moraine, Ohio**

Dear Ms. Patterson:

On April 14, 2016, the Ohio Environmental Protection Agency (Ohio EPA) Division of Environmental Response and Revitalization and Division of Drinking and Ground Waters participated in a conference call with you, Kelsey Hayes Company, Hobart Corporation, and NCR Corporation, GHD Services, and CH2M Hill. GHD provided a presentation on the scoping of the remedial investigation (RI) work plan that is anticipated for the South Dayton Dump and Landfill Site located in Moraine, Montgomery County, Ohio under the recently signed Administrative Settlement Agreement and Order on Consent (June 11, 2016). Ohio EPA is providing the following comments to assist in the scoping of the RI work plan. Because a work plan has not been provided, this is not a comprehensive list of the concerns that Ohio EPA may have. More comments may be forthcoming once the RI work plan is submitted by GHD. In addition, please consider the concerns raised in Ohio EPA's June 30, 2014 comment letter regarding the previously defined Operable Unit 2 work plan (Revised Operable Unit Two RI/FS Work Plan, April 30, 2014) as we still have many of the same concerns regarding the scope of the proposed RI approach and inputs into the risk assessment.

1. During the scoping meeting and again in the April 27, 2016, internal call with you and CH2M Hill, concerns were raised regarding the proposed exposure unit approach and the size of the exposure units. During the April 27 conference call you proposed leaving the exposure units as projected but possibly breaking each exposure unit into sample quadrants. Ohio EPA requests that consideration be given to the size of exposure units and the ability to identify/deal with hot spots when determining proposed sample locations and sample density.

2. From the information presented in the scoping presentation, Ohio EPA has concerns that GHD is proposing ground water samples based on exposure units, which is inappropriate as the exposure unit scenario is not intended for such investigations. Sampling based on exposure unit delineations would be more appropriate for characterizing waste/soil exposure. Exposure units do not address the leaching to ground water pathway.

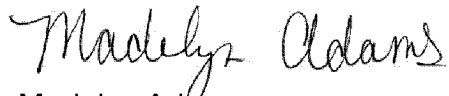
In the RI work plan, Ohio EPA expects to see a leaching investigation, as there is no presumption of a cap over the landfill. This would include current and future leaching. The data that has been collected thus far has given us an idea of where the current plumes are but there has not been a full RI done on the leaching pathway.

3. Questions have circulated on the sample density necessary to investigate the heterogeneous nature of the landfill for the risk assessment. Sample density in the exposure units would depend on the previously collected data and the information that is already known in each exposure unit. Ohio EPA requests that the previous data be compiled comprehensively in the RI work plan. The data can be used to help guide the full RI approach as well as provide justification for the proposed sampling. To help in this endeavor, Ohio EPA requested that an updated conceptual site model be provided in the RI work plan to further identify the risk pathways, exposure scenarios, and data needs and that a Risk Assessment Assumptions Document be prepared by GHD.
4. GHD proposed limited vadose zone sampling at Valley Asphalt and throughout the landfill area. This is not acceptable as Valley Asphalt lies on top of the landfill and includes areas of household waste that has the potential to generate methane and leach to ground water. Ohio EPA expects to see an investigation done on Valley Asphalt for waste and leaching to ground water by the landfill material as well as direct contact for the area. The investigation should extend to the water table and should not be limited to 0-2 feet, as has been proposed in the scoping presentation.
5. No surface soil sampling was proposed on the areas covered by asphalt on the Dryden Road properties. This area may have been landfilled, and it is not clear if the lack of surface soil sampling is appropriate for evaluating potential future exposures.
6. An investigation is needed on the Quarry Pond to identify the possible drums and other debris and to remove the material. An investigation is needed on the water quality of the Quarry Pond as it is in contact with the first ground water bearing zone and has the potential to further contaminate the ground water and be contaminated by the ground water.

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If you have any questions or would like to meet to discuss the concerns, please contact me at (937) 285-6456 or [Madelyn.Adams@epa.ohio.gov](mailto:Madelyn.Adams@epa.ohio.gov).

Sincerely,

A handwritten signature in black ink that reads "Madelyn Adams". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Madelyn Adams  
Site Coordinator  
Division of Environmental Response and Revitalization

cc: Leslie Patterson, U.S. EPA  
Katie Heyob, DDAGW, SWDO  
Allison Reed, DDAGW, SWDO  
Sarah Beal, DERR, CO

MA/bp